

## UNITED STATES DISTRICT COURT

for the  
Southern District of OhioUnited States of America v.  
**Christopher McInturf**  
**105 West National Drive Apt. 07**  
**Newark, Ohio 45033**

Case No. 2:25-mj-91

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 21, 2024-February 21, 2025 in the county of Licking in the  
Southern District of Ohio, the defendant(s) violated:*Code Section*Title 18 USC § 2252(a)(2) & (b)(1)  
Title 18 USC § 2252(a)(4)(B) & (b)(2)*Offense Description*Receipt of child pornography by a person with a  
previous conviction relating to sexual abuse of a  
minor.Possession of child pornography by a person with a  
previous conviction relating to sexual abuse of a  
minor.

This criminal complaint is based on these facts:

See attached affidavit incorporated herein by reference.

☒ Continued on the attached sheet.

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Complainant's signature

Sara Sellers, Special Agent

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Printed name and title

Sworn to before me and signed in my presence.

Date: February 21, 2025City and state: Columbus, OH  
Kimberly A. Johnson  
United States Magistrate Judge

In the matter of:

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

United States of America  
v.  
Christopher W. MCINTURF

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Case No.: 2:25-mj-91

Magistrate Judge: Jolson

National Dr., Apt. 07  
Newark, Ohio 43055

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Sara Sellers (Your Affiant), a Special Agent (SA) with the Homeland Security Investigations (HSI), being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I, Special Agent Sara Sellers (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of 18 U.S.C. §§ 2252(a)(2) and (b)(1)- receipt or distribution and attempted receipt or distribution of a visual depiction of a minor engaged in sexually explicit conduct, of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2)- possession of or access with intent to view and attempted possession of or access with intent to view a visual depiction of a minor engaged in sexually explicit conduct. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Christopher MCINTURF (MCINTURF) committed the violations listed above.
2. I am a Special Agent (SA) of Homeland Security Investigations (HSI), assigned to the Office of the Assistant Special Agent in Charge, Columbus, Ohio since December 2020. During my tenure as a Special Agent, I have completed the Criminal Investigator Training Program (CITP) and the Homeland Security Investigations Special Agent Training Program (HSISAT) at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. During CITP and HSISAT I have received training that included cybercrimes, sexual exploitation of minors, child pornography, and the dark web. I am currently based out of the Franklin County Sheriff's Office Internet Crimes Against Children (ICAC) Task Force investigating child exploitation and am responsible for enforcing federal law in numerous counties in the Southern District of Ohio. Moreover, I am a federal law enforcement officer who is engaged in enforcing federal criminal laws, including 18 U.S.C. § 2251, 2252, and 2252A, and I am authorized by law to request a criminal complaint and arrest warrant.

**PROBABLE CAUSE**

3. In September of 2022, under cover law enforcement ("UCLE") observed URL links posted on different social media platforms, including Discord and X (formerly "Twitter"). The links included the text "/invite." These links redirected to different websites, each of which advertised the sale of Child Sexual Abuse Material (CSAM). These websites were all publicly

layout and structure was identical or nearly identical and each one displayed “sample” CSAM videos. For the purposes of this affidavit, these identical or near-identical websites are referred to as the “CSAM Websites.” Each time a Seller presented UCLE with a CSAM menu, that Seller also provided different options that UCLE could use to make payment. These options included CashApp, Stripe, and virtual currency. Once UCLE chose a form of payment, the Seller identified a particular account or virtual currency wallet to which payment should be made. Those accounts and wallets, each of which was explicitly identified by a Seller as a method of payment for CSAM packages, are referred to here as “CSAM Payment Accounts.” For example, if UCLE told the Seller that he wished to pay via CashApp, the Seller would then identify a particular CSAM Payment Account for CashApp. Once the UCLE made payment to the CSAM Payment Account and the Seller verified this, the Seller would then send UCLE a hyperlink to a MEGA file storage account that contained CSAM.

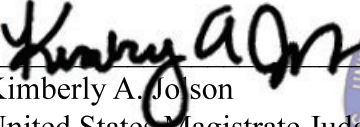
4. As noted above, law enforcement has identified the CSAM Payment Accounts—which consist of either virtual currency wallets or accounts at CashApp, Stripe, or PayPal—that are or have been used to accept payment as part of the criminal scheme described above. The CSAM Payment Accounts include at least nineteen CashApp accounts, at least four Stripe accounts, and at least nine virtual currency wallets. Each of these CSAM Payment Accounts was explicitly identified by a Seller as an acceptable form of payment for CSAM, these CSAM Payment Account owners are referred to here as “Money Mules.” As part of this investigation, law enforcement sent legal process to CashApp, Stripe, and other organizations seeking lists of individuals who made payments to CSAM Payment Accounts. The CSAM Payment Accounts relevant to this investigation included the following:
  - a. CSAM Money Mule account “**Bomen**” was identified utilizing CashApp.
  - b. CSAM Money Mule account “**Beast**” was identified utilizing CashApp.
5. Law enforcement reviewed the records provided by CashApp for Money Mule accounts “**Bomen**” and “**Beast**”. Law enforcement focused on time periods when they knew the CSAM Payment Account was receiving proceeds related to the criminal scheme described above. Law enforcement observed the CashApp account “**C\_0newe0mbn**” had completed a transaction with Money Mule account “**Bomen**” on April 12, 2023, and money mule account “**Beast**” on September 03, 2023. **C\_0newe0mbn** made a transaction to CSAM Money Mule “**Bomen**” for thirty-five dollars (\$35.00). This dollar amount matched one of the advertised CSAM tiers on the “CSAM menus” of Encrypted Application A. Additionally, **C\_0newe0mbn** made a transaction to CSAM Money Mule “**Beast**” for ninety dollars (\$90). This dollar amount matched one of the advertised CSAM tiers on the “CSAM menus” of Encrypted Application A.
6. Law enforcement reviewed the account information related to the CashApp account “**C\_0newe0mbn**”. The records revealed that the name listed on the account of the CashApp account “**C\_0newe0mbn**” under the section “Identity Verification Name” was Christopher MCINTURF. The CASHAPP account “**C\_0newe0mbn**” opened December 18, 2022, presented a date of birth of, 1969-05-09 which matches MCINTURF’S date of birth according to background checks conducted by law enforcement. The last four numbers of a social security number “**7517**” were also listed on the account, these are the same last four numbers of MCINTURF’s social security number. The address listed on the account is **105 National Dr., Apt. 09, Newark, Ohio 43055**. MCINTURF currently resides at the same address however, is registered to Apt. 07, according to his parole officer. The display name history shows the following display name also associated with the account: “**christopher7517**”.
7. Additionally, Special Agents submitted an HSI Custom summons to Charter Communications

was the IP address utilized by **MCINTURF** on April 12, 2023, during the \$35 transaction with the CSAM Money Mule “**Bomen**”. The return information included the Subscriber name: Christopher **MCINTRUF**, Service Address: 105 W. National Dr Apt. 7, Newark, Ohio, 43055, and phone number: (740) 975-8875.

8. On February 21<sup>st</sup>, 2025, Special Agent’s executed a search warrant of 105 W. National Drive Unit 07, Newark, Ohio for electronic devices. Special Agent’s confirmed the presence of child sexual abuse material on **MCINTURF**’s iPad. The media file is described as a still image taken from a video that is approximately one minute in length, found in a chat with Telegram User “Posi Posi”. The picture depicts what appears to be two prepubescent females approximately eight to twelve years of age face down on a bed, their buttocks are exposed in a lascivious manner, the focus of the photo is the minor female’s buttocks. Their underwear is observed around their ankles.
9. According to The Court of Common Pleas located in Licking County, Ohio, on January 07, 2011, Christopher W. **MCINTURF**, was convicted of Rape of a Minor under the age of 13 (two counts) in violation of O.R.C Section 2907.02(A)(1)(b), felonies of the first degree; and Sexual Battery (two counts), a violation of O.R.C. Section 2907.03(A)(5), felonies of the third degree. MCINTURF was sentenced to three (3) years on count 1, three (3) years on count 2, two (2) years on count 3, and two years (2) on count 4. All counts were ordered to run consecutively for an aggregate sentence of ten (10) years. Additionally, MCINTURF was sentenced to a mandatory period of five years of post-release control following the imposed prison sentence.
10. Based upon the foregoing, your affiant submits that there is probable cause to believe that **MCINTURF** has committed the violations of 18 U.S.C. §§ 2252(a)(2) & (a)(4)(B). Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.

Subscribed and sworn to before me on: Feb. 21, 2025

Respectfully submitted,

  
Kimberly A. Johnson  
United States Magistrate Judge



*Sara K. Sellers*

Sara Sellers

Special Agent  
Homeland Security